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8 Attorney for Defendant

9  
10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA

13 Plaintiff(s),

14 v.

15 CLIVEN D. BUNDY

16 Defendant.

Case No.:  
2:16-CR-00046-GMN-PAL-1

17 **ERRATA TO DEFENDANT CLIVEN BUNDY'S MEMORANDUM OF LAW**  
18 **IN SUPPORT OF MOTION TO DISQUALIFY**  
19 **JUDGE GLORIA NAVARRO UNDER 28 U.S.C. §144**

20 COMES NOW, the Defendant, Cliven D. Bundy, by and through his attorney,  
21 Joel F. Hansen, Esq., and presents the following Errata to the Defendants Cliven  
22 Bundy's Memorandum of Law in Support of Motion to Disqualify Judge Gloria  
23 Navarro Under 28 U.S.C. §144 filed with the court on 5/20/16 as Document #427.

24 At p. 10 of the moving papers, it shows an electronic signature of Larry  
25 Klayman as follows: /s/ Larry Klayman.

26 This was a clerical error which counsel for the Defendant, Joel F. Hansen did  
27 not notice as the pleading was being filed. This occurred because Mr. Hansen was  
28 without clerical help on Friday afternoon, May 20, 2016, and therefore, had to use the

1 utilize the services of another attorney's secretary in the same building as Mr. Hansen,  
2 by the name of Karen Thomas, secretary to Jimmy Howard Law Firm. Karen Thomas  
3 was not aware that I had instructed my staff not to sign Larry Klayman's name to  
4 anything because he was not certified to be in the case due to Judge Navarro's denial of  
5 his application for pro hac vice status.

6 Therefore, counsel submits p. 10 of the said pleading again, corrected so that it  
7 does not show Mr. Klayman's signature. See **Exh. A**. The reason Mr. Klayman's name  
8 was even mentioned at the bottom of the pleading is because the defense was continuing  
9 to request that Mr. Klayman be admitted pro hac vice and therefore was tangentially  
10 involved in the case.  
11

12 Moreover, in the Certificate of Counsel of Filing in Good Faith . . . which was  
13 attached to the Defendant's Amended and Superseding Motion to Disqualify Judge  
14 Gloria Navarro etc., the signature page shows Larry Klayman's electronic signature.  
15 Again, this is a clerical error, since Mr. Klayman's electronic signature is not shown on  
16 p. 14 of the Amended and Superseding motion. The corrected page is attached hereto  
17 as **Exh. B**.  
18

19 Dated: May 25, 2016

20 Respectfully submitted,

21 /s/ Joel F. Hansen, Esq.

22 **JOEL F. HANSEN, ESQ.**

23 Nevada Bar No. 1876

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Attorney for Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2016, I electronically filed the foregoing ERRATA TO DEFENDANT CLIVEN BUNDY'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISQUALIFY JUDGE GLORIA NAVARRO UNDER 28 U.S.C. §144 with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to opposing counsel registered on CM/ECF.

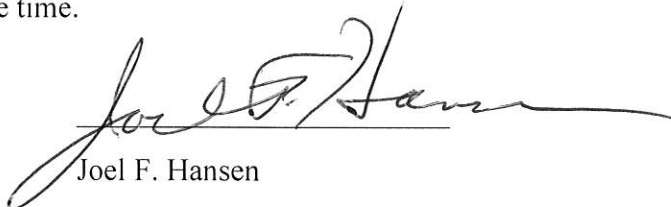
/s/ Joel F. Hansen  
Joel F. Hansen, Esq.

**AFFIDAVIT OF JOEL F. HANSEN**


Joel F. Hansen, being first duly sworn under oath, deposes and says:

1. That I am counsel for the Defendant Cliven D. Bundy.
2. That I instructed my staff not to show an electronic signature for Mr. Klayman on any of the pleadings to this court.
3. That unfortunately his signature was electronically added to Defendant Cliven Bundy's Memorandum of Law in Support of Motion to Disqualify which was filed with the court on May 20, 2016, Doc #427, but as the Court can see it was not added to the Certificate of Counsel filed on that same day with the same pleading. This occurred because of Mr. Hansen's lack of office staff that day at which time he had to solicit the services of another secretary in the building, Karen Thomas, employee of James Howard Law Firm.
4. That unfortunately, the error was carried forward in that Mr. Klayman's electronic signature is shown on the Certificate of Counsel filed with Cliven Bundy's Amended and Superseding Motion filed with the Court on May 24, 2016.
5. That neither of these electronic signatures should have been shown at all, since Mr. Klayman was not admitted to this court and instructed me and my staff not to put his signature on anything until his pro hac vice application was approved.
6. That Mr. Klayman's name was only shown at the bottom of these pleadings because of Cliven Bundy's ongoing desire to have him named as his attorney pro hac vice and a Motion for Reconsideration was pending at the time.

Further, your affiant saith naught.

  
Joel F. Hansen

SUBSCRIBED and SWORN to me  
On this 25<sup>th</sup> day of May, 2016.

  
NOTARY PUBLIC

